

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST
LITIGATION*

Case No. 22-md-03031 (JRT/JFD)

This Document Relates To:

All Actions

**CATTLE PLAINTIFFS’ UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF CATTLE-JBS SETTLEMENT**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, plaintiffs Ranchers Cattlemen Action Legal Fund United Stockgrowers of America, Farmers Educational and Cooperative Union of America, Weinreis Brothers Partnership, Minatare Feedlot, Inc., Charles Weinreis, Eric Nelson, James Jensen d/b/a Lucky 7 Angus, and Richard Chambers as trustee of the Richard C. Chambers Living Trust (collectively, the “Cattle Plaintiffs”) on behalf of themselves and the other members of the proposed Settlement Classes¹ move for preliminary approval of the Cattle-JBS Settlement with JBS USA Food Company, Swift Beef Company, JBS Packerland, Inc., and JBS S.A. (collectively, “JBS”). The Cattle-JBS Settlement, if approved, will completely resolve Cattle Plaintiffs’ and the Settlement Classes’ claims against JBS and establish an \$83,500,000 Settlement Fund. JBS does not oppose the filing of this motion.

¹ Unless otherwise defined herein, all capitalized terms have the same meanings as defined in the Stipulation and Agreement of Settlement Between Cattle Plaintiffs and JBS USA Food Company, Swift Beef Company, JBS Packerland, Inc., and JBS S.A. (“Stipulation”).

This motion is supported by the memorandum of law submitted herewith, the Joint Declaration of Patrick J. McGahan and Daniel O. Herrera, and accompanying exhibits, including the Stipulation, and all of the files, records, and proceedings in this case.

Wherefore, Cattle Plaintiffs respectfully request that the Court grant their motion.

Dated: January 31, 2025

Respectfully submitted,

/s/ Patrick J. McGahan

David R. Scott (*pro hac vice*)
Amanda F. Lawrence (*pro hac vice*)
Patrick J. McGahan (*pro hac vice*)
Michael P. Srodoski (Bar No. 0398250)
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
156 Main Street
P.O. Box 192
Colchester, CT 06415
Tel.: 860-537-5537
Fax.: 860-537-4432
david.scott@scott-scott.com
alawrence@scott-scott.com
pmcgahan@scott-scott.com
msrodoski@scott-scott.com

Joseph P. Guglielmo (*pro hac vice*)
Matthew J. Perez (*pro hac vice*)
Anna Hunanyan (*pro hac vice*)
Michelle Conston (*pro hac vice*)
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
The Helmsley Building
230 Park Avenue, 24th Floor
New York, NY 10169
Tel.: 212-223-6444
Fax: 212-223-6334
jguglielmo@scott-scott.com
matt.perez@scott-scott.com
ahunanyan@scott-scott.com

/s/ Ellen Meriwether

Ellen Meriwether (*pro hac vice*)
Jennifer W. Sprengel (*pro hac vice*)
Daniel O. Herrera (*pro hac vice*)
Kaitlin Naughton (*pro hac vice*)
CAFFERTY CLOBES
MERIWETHER & SPRENGEL LLP
135 S. LaSalle Street, Suite 3210
Chicago, IL 60603
Tel.: 312-782-4882
Fax: 312-782-4485
jsprengel@caffertyclobes.com
dherrera@caffertyclobes.com
knaughton@caffertyclobes.com

Interim Co-Lead Counsel for the Cattle Plaintiffs

K. Craig Wildfang (Bar No. 0117043)
Thomas J. Undlin (Bar No. 0183751)
Stacey P. Slaughter (Bar No. 0296971)
Geoff Kozen (Bar No. 0398626)
Eric P. Barstad (Bar No. 0398979)
ROBINS KAPLAN LLP
800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55402
Tel.: 612-349-8500
Fax: 612-339-4181
kcwildfang@robinskaplan.com
tundlin@robinskaplan.com
ssllaughter@robinskaplan.com

mconston@scott-scott.com

Sean C. Russell (*pro hac vice*)

Isabella De Lisi (*pro hac vice*)

SCOTT+SCOTT

ATTORNEYS AT LAW LLP

600 W. Broadway, Suite 3300

San Diego, CA 92101

Tel.: 619-233-4565

Fax: 619-233-0508

srussell@scott-scott.com

idelisi@scott-scott.com

gkozen@robinskaplan.com

ebarstad@robinskaplan.com

Liaison Counsel for the Cattle Plaintiffs

David E. Kovel (*pro hac vice*)

Thomas W. Elrod (*pro hac vice*)

KIRBY MC INERNEY LLP

250 Park Avenue, Suite 820

New York, NY 10177

Tel.: 212-371-6600

Fax: 212-751-2540

dkovel@kmlp.com

telrod@kmlp.com

Anthony F. Fata (*pro hac vice*)

KIRBY MC INERNEY LLP

211 West Wacker Drive, Suite 550

Chicago, IL 60606

Tel.: 312-767-5180

Fax: 312-767-5181

afata@kmlp.com

Daniel Warshaw (*pro hac vice*)

Bobby Pouya (*pro hac vice*)

Michael H. Pearson (*pro hac vice*)

PEARSON WARSHAW, LLP

15165 Ventura Boulevard, Suite 400

Sherman Oaks, CA 91403

Tel.: 818-788-8300

Fax: 818-788-8104

dwarshaw@pwfirm.com

bpouya@pwfirm.com

mpearson@pwfirm.com

Michael Schrag (*pro hac vice*)

George Sampson (*pro hac vice*)

Elizabeth C. Pritzker (*pro hac vice*)

Caroline Corbitt (*pro hac vice*)

PRITZKER LEVINE LLP

1900 Powell Street, Ste. 450

Emeryville, CA 94602

Tel.: 415-692-0772

Fax: 415-366-6110
mls@pritzkerlevine.com
gws@pritzkerlevine.com
ecp@pritzkerlevine.com
ccc@pritzkerlevine.com

***Interim Executive Committee for the
Cattle Plaintiffs***